

Exhibit 1

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February 1, 2018

VIA E-MAIL

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Joseph Saveri Law Firm
555 Montgomery Street, Suite 1210
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Adam Zapala
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840 Malcolm Road, Suite 200
Burlingame, CA 94010

Re: *In re Capacitors Antitrust Litigation*, Case No. 3-14-cv-03264-JD (N.D. Cal)

Dear Counsel:

On behalf of our clients, Defendants Panasonic Corporation, Panasonic Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America Corporation (collectively, the “Panasonic & Sanyo Defendants”), we write to notify you that it has recently come to our attention that the documents listed in Exhibit 1 (the “Privileged Documents”) were inadvertently produced and should have been withheld on the basis of the attorney-client and work product privileges. Please note that this list includes several documents that were included in the list of exemplar documents for the upcoming Panasonic 30(b)(6) deposition (although we note the substance of those documents relates to Sanyo and so would not be addressed by the Panasonic 30(b)(6) witness in any event).

The Privileged Documents consist of:

1. Documents prepared by the Panasonic & Sanyo Defendants’ legal department or by Panasonic or Sanyo employees at the direction of Panasonic & Sanyo Defendants’ legal department for the purpose of obtaining legal advice from counsel; and
2. Document created by or at the direction of the Panasonic & Sanyo Defendants’ legal department and outside counsel at Winston & Strawn LLP during the course of their investigation concerning the conduct at issue in this litigation.

As Defendants explained in their January 5, 2018 Opposition to Direct Purchaser Plaintiffs’ Motion to Compel (Dkt. No. 2004), these type of documents are protected by the attorney-client privilege

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and/or the work product doctrine. Specifically, the first category of documents—documents prepared by the Panasonic & Sanyo Defendants’ legal department or by Panasonic or Sanyo employees for the purpose of seeking legal advice—fall squarely within the attorney-client privilege. *See AT&T Corp. v. Microsoft Corp.*, No. 02-0164, 2003 WL 21212614, at *3 (N.D. Cal. Apr. 18, 2003) (privilege applied to memorandum “prepared at the behest of corporate counsel” and “for the purpose of seeking legal advice”); *see also In re TFT-LCD (Flat Panel) Antitrust Litig.*, No. M 07-1827, 2009 WL 2905898, at *2 (N.D. Cal. Sept. 10, 2009); *Greyhound Lines Inc. v. Viad Corp.*, No. CV-15-01820, 2016 WL 4703340, at *2 (D. Ariz. Sept. 8, 2016). The second category of documents—communications and documents generated during the course of counsel’s investigation concerning the conduct at issue in this litigation—are protected from disclosure by both the attorney-client privilege and the work product doctrine. *Keith v. Clatskanie People's Util. Dist.*, No. 3:13-CV-01332, 2014 WL 2803452, at *3 (D. Or. June 18, 2014) (“the Ninth Circuit and other circuits hold that the attorney-client privilege includes a factual investigation by an attorney in connection with the provision of legal services to a client”); *see also In re Kellogg Brown & Root, Inc.*, 756 F.3d 754, 758 (D.C. Cir. 2014); *Robinson v. Cty. of San Joaquin*, No. 2:12-CV-2783, 2014 WL 5473049, at *2, *6 (E.D. Cal. Oct. 28, 2014); *Kayata v. Foote, Cone & Belding Worldwide, L.L.C.*, No. 99 CIV. 9022, 2000 WL 502859, at *3 (S.D.N.Y. Apr. 26, 2000).

Thus, pursuant to Paragraph 7(b) of the ESI Stipulation and Order and Fed. R. Civ. P. 26(b)(5)(B), the Panasonic & Sanyo Defendants hereby request that each party receiving this letter return and/or confirm that they have destroyed all copies (both electronic and paper) of the documents identified in Exhibit 1. This would include destroying or causing to be destroyed any copies of the Privileged Documents that were disclosed to authorized third parties, including but not limited to consultants, experts, vendors, and the like. In addition, please confirm that all analyses, emails, memoranda, outlines, notes, or any other materials that you prepared based on or referring to the privileged information contained in this document have also been destroyed. Please provide confirmation of compliance within three (3) business days.

The production of these documents shall not be deemed a waiver of the applicable privileges or protections as the disclosure was inadvertent, the Panasonic & Sanyo Defendants took reasonable steps to prevent the disclosure, and the Panasonic & Sanyo Defendants have taken reasonable steps to rectify the error. The Panasonic & Sanyo Defendants also have sent the same clawback request to all other parties that received copies of these documents. We are in the process of preparing a privilege log for the non-investigation-related Privileged Documents, and will provide a copy as soon as possible. Per the agreement and practice among the parties, the investigation-related documents will not be logged.

Sincerely,

/s/ Mollie C. Richardson

Mollie C. Richardson
Winston & Strawn LLP

Enclosure

EXHIBIT 1

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